

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

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In re : **Chapter 9**
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CITY OF DETROIT, MICHIGAN, : **Case No. 13-53846**
:
Debtor. : **Hon. Steven W. Rhodes**
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**DECLARATION OF ALFREDO R. PÉREZ IN SUPPORT OF
JOINT PRETRIAL BRIEF IN SUPPORT OF OBJECTION TO DIA SETTLEMENT**

I, Alfredo R. Pérez, declare as follows:

1. I am a partner in the firm of Weil, Gotshal & Manges LLP, attorneys for Financial Guaranty Insurance Company (“**FGIC**”) in connection with the above-captioned chapter 9 case.

2. I respectfully submit this declaration in support of the *Joint Pretrial Brief in Support of Objection to DIA Settlement*, filed contemporaneously herewith.

3. I have personal knowledge of the information set forth herein.

4. Attached hereto as Exhibit A¹ is a true and correct copy of certain transcript excerpts from the Deposition of Kevyn Orr, dated July 21-22, 2014.

5. Attached hereto as Exhibit B is a true and correct copy of certain transcript excerpts from the Deposition of Kenneth Buckfire, dated July 15-16, 2014.

¹ Exhibit numbers referenced herein match the exhibit numbers that have been assigned to such documents on the exhibit lists submitted in connection with the hearing to consider confirmation of the City’s proposed chapter 9 plan of adjustment. The two depositions attached hereto as exhibits, which have not been listed on an exhibit list, are identified with letters to avoid confusion.

6. Attached hereto as Exhibit 267 is a true and correct copy of that certain Collections Management Policy, dated February 13, 2012.
7. Attached hereto as Exhibit 3076 is a true and correct copy of those certain Arts Commission Minutes, dated June 2, 1919.
8. Attached hereto as Exhibit 3147 is a true and correct copy of those certain Arts Commission Minutes, dated January 27, 1941.
9. Attached hereto as Exhibit 3208 is a true and correct copy of those certain DMA Meeting Minutes, dated September 12, 1919.
10. Attached hereto as Exhibit 3216 is a true and correct copy of that certain Deed of Gift, dated April 25, 1988.
11. Attached hereto as Exhibit 3270 is a true and correct copy of that certain Report of Councilman Nagel, dated November 18, 1919.
12. Attached hereto as Exhibit 3272 is a true and correct copy of that certain Summary Inventory of Archives, dated November 1, 1990.
13. Attached hereto as Exhibit 3273 is a true and correct copy of that certain Report of Controller, dated December 16, 1919.
14. Attached hereto as Exhibit 3285 is a true and correct copy of that certain Letter with Standard Purchasing Agreement, dated August 21, 2000.
15. Attached hereto as Exhibit 3286 is a true and correct copy of those certain DIA Collection Management Policy Attachments.
16. Attached hereto as Exhibit 3560 is a true and correct copy of that certain Acknowledgment of Gift, dated September 17, 1923.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that, to the best of my knowledge, information and belief, the foregoing is true and correct.

Dated: August 27, 2014
Houston, Texas

/s/ Alfredo R. Pérez

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